US ERA ARCHIVE DOCUMENT

CHILD-RESISTANT PACKAGING REVIEW

Technical Review Branch

OUT 04/17/98

IN 02/17/98

Reviewed by Rosalind L. Gross 711 04/17/98
EPA Reg. No. or File Symbol <u>64248-12</u>
DP Barcode
EPA Petition or EUP No
Date Division Received
Type Product(s) <u>Insecticide</u>
Data Accession No(s).443881-01,
Product Mgr./Chemical Review Mgr/Contact Person PM 03 Division RD
Product Name(s)
Company Name(s)
Submission Purpose <u>Examine to ascertain if packaging is CRP</u>
Active Ingredient(s), PC code, & % Fipronil

Summary of Findings

The station is black 40ml HIPS base, black 40ml HIPS lid, improved smear weld. Children were each given 12 4-ups (48 stations). Results indicate 2 children accessed one bait station each and a third child (pkg 29) tore plastic, but station was not considered accessed. It is unclear as to whether stations were attached to each other or to plastic frame. This is a pass of the child test according to the sequential test chart in 16 CFR 1700.20. Although acceptable, registrant should be reminded that definition of access needs to include any access to bait (e.g. expose bait, touch bait, suck bait, crack station, ripping the station, putting a hole in it, bait fall out, poking the bait out, etc.). The CRP test needs to address all of these possibilities. Since study is a pass the CRP certifications are acceptable.

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